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Attorneys for Defendant
WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MOHAMMAD SUBHANI,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION an FDIC insured corporation
and does 1 through 100, inclusive,

Defendant.

Case No.: 3:12-cv-01755-MEJ

**STIPULATION TO CONTINUE
DEFENDANT'S DEADLINE TO
RESPOND TO COMPLAINT**

Complaint Date: March 8, 2012

WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial complaint ("Complaint") in the Superior Court of the State of California, for the County of Contra Costa, Case No. C 12-00551 ("Action");

WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo Bank, N.A. ("Wells Fargo");

WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;

WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's initial deadline to answer or otherwise respond to the Complaint was April 16, 2012;

WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the Complaint until April 30, 2012;

WHEREAS, the parties have engaged in settlement discussions, which are ongoing;

WHEREAS, to facilitate the parties' settlement discussions, Plaintiff has agreed to extend the deadline for Wells Fargo to respond to the Complaint by another 14 days; and

NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their respective counsel, that:

1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including May 14, 2012; and

2. This stipulation is without prejudice to the rights, claims, arguments and defenses of all parties.

DATED: April 25, 2012

SAGARIA LAW, P.C.

By: /s/ Elliott W. Gale
Elliot W. Gale

Attorneys for Plaintiff
Mohammad Subhani

DATED: April 25, 2012

SEVERSON & WERSON
A Professional Corporation

By: /s/ Alisa A. Givental
Alisa A. Givental

Attorneys for Defendant
Wells Fargo Bank, N.A.

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from Elliott W. Gale.

/s/ Alisa A. Givental
Alisa A. Givental

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:

IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including May 14, 2012.

DATED: April 27, 2012



CHIEF MAGISTRATE JUDGE
MARIA-ELENA JAMES